

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

In re: Richard D. Kalman : CASE NO. 20-12584-MDC
Debtor :
: Chapter 13

PENNYMAC LOAN SERVICES, LLC :
Movant :
v. :
RICHARD D. KALMAN :
Debtor :
and :
WILLIAM C. MILLER, ESQ. :
Trustee :
:

**RESPONSE OF DEBTOR TO
MOTION OF PENNYMAC LOAN SERVICES, LLC
FOR RELIEF FROM THE AUTOMATIC STAY
UNDER SECTION 362**

Debtor, Richard D. Kalman, by his attorney John M. Kenney, hereby responds to the Motion of PennyMac Loan Services, LLC for Relief from the Automatic Stay, and responds accordingly as follows:

1. Admitted.
2. Admitted.
3. Admitted.
4. Admitted.
5. Admitted
6. Denied. It is denied that the Debtor has failed to make the monthly payments for the alleged period.
7. Denied. The Debtor can neither admit nor deny the allegations contained in Paragraph 7 and same are denied as such.
8. Denied. It is denied that the Movant is entitled to relief from stay for cause.
9. Denied.

10. Denied.

WHEREFORE, Debtor, Richard D. Kalman, hereby prays this court would deny and dismiss the Motion of PennyMac Loan Services. LLC for Relief from the automatic stay.

Date: December 23, 2020

/s/ John M. Kenney
JOHN M. KENNEY, ESQUIRE
Attorney for Debtor
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